

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ALABAMA EASTERN
DIVISION**

**FEDERAL INSURANCE COMPANY,
PACIFIC EMPLOYERS INSURANCE
COMPANY, ACE AMERICAN
INSURANCE COMPANY, ACE
PROPERTY AND CASUALTY
INSURANCE COMPANY, INDEMNITY
INSURANCE COMPANY OF NORTH
AMERICA, and WESTCHESTER FIRE
INSURANCE COMPANY,**

Plaintiffs,

v.

SHAW INDUSTRIES, INC.,

Defendant,

and

**GREAT AMERICAN INSURANCE
COMPANY, COMMERCE & INDUSTRY
INSURANCE COMPANY; FIREMAN'S
FUND INSURANCE COMPANY; FIRST
STATE INSURANCE COMPANY;
EMPLOYERS MUTUAL LIABILITY
INSURANCE COMPANY; U.S. FIRE
INSURANCE COMPANY; TRAVELERS
CASUALTY AND SURETY COMPANY;
WESTPORT INSURANCE
CORPORATION f/k/a PURITAN
INSURANCE COMPANY; JOHN DOE
INSURERS 1-100;**

Nominal Defendants.

Case No. 1:23-CV-01367-RDP

**DEFENDANT GREAT AMERICAN
INSURANCE COMPANY'S UNOPPOSED
MOTION FOR EXTENSION OF TIME**

DEFENDANT GREAT AMERICAN INSURANCE COMPANY’S UNOPPOSED MOTION
FOR EXTENSION OF TIME

Great American Insurance Company (“GAIC”), through its undersigned counsel and pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, hereby moves for a 30-day extension of time to respond to the Complaint filed by Plaintiffs Federal Insurance Company, Pacific Employers Insurance Company, ACE American Insurance Company, ACE Property and Casualty Insurance Company, Indemnity Insurance Company of North America, and Westchester Fire Insurance Company (“Plaintiffs”). Plaintiffs do not oppose the requested extension. In support of this Motion, GAIC states:

1. On October 11, 2023, Plaintiffs filed the Complaint for Declaratory Judgment against Defendant Shaw Industries, Inc., as well as numerous Nominal Defendants. (ECF 1).

2. On or around October 26, 2023, the Complaint was served on GAIC.

3. Under Rule 12(a)(1)(A)(i) of the Federal Rules of Civil Procedure, GAIC’s deadline to respond to the Complaint is due on or around November 17, 2023.

4. Because of the number of insurance carriers involved, including the Nominal Defendants, and the necessity of having all Nominal Defendants served so that this matter can move forward with judicial efficiency and economy, GAIC requests a 30-day extension of time to respond to the Complaint.

5. This Motion is authorized by Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and is made in good faith and not for the purpose of delay. No party will be prejudiced by the requested extension.

6. Counsel for GAIC has conferred with counsel for Plaintiffs, and Plaintiffs do not

oppose the requested extension.

7. Accordingly, GAIC respectfully requests a 30-day extension of time to file its response to the Complaint, up to and including December 18, 2023.

Dated: November 17, 2023

Respectfully submitted:

By: /s/ Edward M. Holt

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- and -

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